

July 13, 2022

BY ECF

The Honorable Naomi Reice Buchwald
United States District Judge
Daniel Patrick Moynihan United States Courthouse
Room 2270
500 Pearl St.
New York, NY 10007

Re: *Emery Celli Brinckerhoff Abady Ward & Maazel LLP v. U.S. Dep't of Homeland Security*, No. 22 Civ. 873 (NRB)

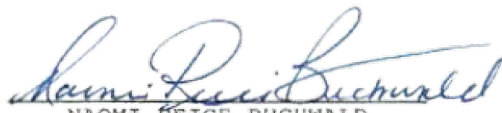
Dear Judge Buchwald:

On behalf of the parties in the above-referenced case brought by Plaintiff Emery Celli Brinckerhoff Abady Ward & Maazel ("Plaintiff") pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552, against the United States Department of Homeland Security ("DHS") and Office of Inspector General, United States Department of Homeland Security ("DHS-OIG," and together with DHS, "Defendants"), we write respectfully to provide a status update pursuant to the Court's June 14, 2022, order. Dkt. No. 21.

As previously reported, DHS-OIG conducted searches for responsive records and processed and produced over 1,000 pages of records in March. The remainder of the responsive records left to be reviewed and processed were referred pursuant to 6 C.F.R. § 5.4(d)(3) to U.S. Customs and Border Protection ("CBP"). CBP timely made its first production of records on June 24, 2022, and it remains on schedule to process and produce the remainder of the records, with a production on July 25, 2022, and a final production on or before August 24, 2022. As CBP makes rolling productions to Plaintiff, the parties anticipate that they will continue to confer to resolve any disputes that may arise.

Accordingly, the parties respectfully request that the Court permit the parties to submit a further status report on August 19, 2022, advising the Court of the parties' progress on this matter.

Application granted. **SO ORDERED.**


NAOMI REICE BUCHWALD
UNITED STATES DISTRICT JUDGE

Dated: New York, New York
July 15, 2022

Honorable Naomi Reice Buchwald
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We thank the Court for its consideration of this letter.

Respectfully submitted,

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¹ Consent for signature obtained pursuant to S.D.N.Y. ECF Rule 8.5(b).